## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

LISA BARBOUNIS : CIVIL ACTION

: NO. 2:19-cv-05030-JDW

Plaintiff, : NO. 2:20-cv-02946

-VS-

:

THE MIDDLE EAST FORUM, et al.

:

Defendants.

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## <u>DEFENDANTS THE MIDDLE EAST FORUM, MR. DANIEL PIPES, AND MR. GREGG</u> <u>ROMAN'S OMNIBUS MOTION FOR SUMMARY JUDGMENT</u>

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendants The Middle East Forum, Mr. Daniel Pipes, and Mr. Gregg Roman, by and through counsel, respectfully move this Court for an entry of summary judgment as to Plaintiff Lisa Barbounis' claims against them and on liability as to the Counterclaims brought by The Middle East Forum against Barbounis.

Defendants incorporate herein the accompanying memorandum of law. For the reasons set forth in the memorandum of law, Defendants respectfully request that this Court grant this Motion.

Respectfully submitted,

/s/ Jonathan R. Cavalier /s/ Sidney L. Gold

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